

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ROOTS ROCK RAGE, LLC d/b/a SLOTH)
STEADY, a Michigan limited liability)
company, and NATHAN RUSSELL,)

Plaintiffs,

v.

ELECTRIC FOREST, LLC, a Delaware)
limited liability company, MADISON)
HOUSE PRESENTS, LLC, a Delaware)
limited liability company, and)
INSOMNIAC HOLDINGS, LLC, a)
Delaware limited liability company,)

Defendants.

Case No. _____

DECLARATION OF IAN HUMPHREY

I, Ian Humphrey, hereby declare as follows:

1. I am Senior Counsel at Insomniac Holdings, LLC. I submit this declaration in support of Defendants' Notice of Removal filed in the above-captioned action. I am familiar with the facts set forth below.

2. Defendant Insomniac Holdings, LLC is a Delaware limited liability company, and its principal place of business is located in California. It has four members, Pasquale Rotella, Live Nation Worldwide, Inc., Insomniac, Inc., and Insomniac Entertainment, Inc.

3. Pasquale Rotella is domiciled in Nevada.

4. Live Nation Worldwide, Inc., is incorporated under the laws of Delaware, and its principal place of business is in California.

5. Insomniac, Inc. is incorporated under the laws of Nevada, and its principal place of business is in Nevada.

6. Insomniac Entertainment, Inc. is incorporated under the laws of Delaware, and its principal place of business is located in Nevada.

I declare under penalty of perjury that the statements in this Declaration are based on my personal knowledge, and that, to the best of my knowledge, the statements contained in this Declaration are true and correct.

Executed this 5th day of November, in Beverly Hills, California.

A handwritten signature in blue ink, appearing to read 'Ian Humphrey', is written over a horizontal line.

Ian Humphrey